EXHIBIT "P-25"

Case 2:22-cv-00688-JMY Document 196-32 RKADLER

Page **EXHIBIT**

Nanaging Partner 212.381.0838 rka@rkadler.law

February 23, 2022

Manfred Sternberg, Esq. Attorney at Law 1700 Post Oak Blvd., 2 Blvd. Place, Suite 600 Houston, TX 77056 **United States of America**

Demand for Preservation of Funds as well as Documents Related to all Transactions between Charlton RE: Holdings Group, LLC and VRC Medical Services

Dear Manfred:

This law firm, RK ADLER & Associates, PLLC, along with The Law Offices of Robert G. Stahl, LLC, represents VRC Medical Services of 357 Elf Road, Suite B, Sewaren, New Jersey 07077 ("VRC").

As previously indicated to you, in my February 10, 2022 demand letter, your client, Charlton Holdings Group, LLC ("Charlton"), entered into several Sale and Purchase Agreements (collectively, the "SPA") to supply a total of Two Hundred Four Thousand One Hundred Twenty (204,120) two (2) count iHealth COVID-19 home test kits to VRC (collectively, the "Transaction"). In connection with the Transaction, VRC deposited for safekeeping to your Attorney IOLTA a total of Two Million Four Hundred Forty-Nine Thousand Four Hundred Forty-Four United States Dollars (\$2,449,440.00 USD).

Charlton has failed to perform on its contractual obligations and is in material breach of the SPA. For avoidance of doubt, you are hereby placed on notice that there is an official dispute as to the funds currently being held in your IOLTA account that pertain to the Transaction between your client, Charlton Holdings Group, LLC, "Sam" Shlomo Gross, and our client VRC. As previously indicated in my February 10, 2022 demand letter, you are on notice that the funds are the property of VRC and its contracted parties and cannot be disbursed until this matter is resolved. Should Charlton, or anyone purportedly acting on its behalf, claim that the deal has been completed and the goods delivered, that is incorrect and any paperwork supposedly reflecting same would be fraudulent. The transaction has not been completed, the contract has not been met and the funds must not be disbursed to Charlton nor any person or company on its behalf.

DO NOT DISBURSE ANY PORTION OF THE FUNDS TOTALING TWO MILLION FOUR HUNDRED FORTY-NINE THOUSAND FOUR HUNDRED FORTY-FOUR UNITED STATES DOLLARS (\$2,449,440.00 USD). THESE FUNDS MUST BE HELD IN TRUST IN YOUR ATTORNEY IOLTA ACCOUNT UNTIL THE TRANSACTION IS COMPLETE.

You were previously placed on notice that you must take all necessary steps to preserve, and not destroy, conceal, or alter, any and all communications and documents relevant to this matter, including by way of example, and without limitation, emails, text and self-destructing messages, social media posts, voicemails, records, files and other data,



Randolph K. Adler, Jr. Managing Partner 212.381.0838 rka@rkadler.law

wherever located and regardless of the format or media. We reiterate this notification. As before, you are also notified that purposeful destruction of such evidence could result in penalties, including legal sanctions.

Litigation counsel will be in communication with you about this matter in the coming days. Thank you, in advance, for your prompt attention to this extremely important and time-sensitive matter.

Very truly yours,

Randolph K. Adler, Jr.

Randolph K. Adler, Jr.

Managing Partner

cc: Robert G. Stahl, Esq.